

NEBRASKA STATE FIRE MARSHAL OFFICIAL INTERPRETATION



Interpretation Number: 07-02

Date: 07-07

Pamphlet Number: NFPA 101, 2000 ed.

Section(s): 18, 19.2.2.2.4

Comments:

This interpretation is in compliance with CMS requirements. It replaces Official Interpretation 02-02 which is no longer valid.

Question: Are doors in a means of egress in a health care occupancy permitted to be locked?

Response: Yes, as specified below.

Locking devices on doors in a means of egress are permitted in facilities where the clinical needs of the occupants require specialized security measures for their safety.

Any occupant that does not require security measures based on clinical needs must have access to egress doors without locks or devices that require the use of a key, code, card or special knowledge to operate. This includes all staff, visitors and residents/patients who do not require security measures based on clinical needs.

Doors that have locks such as key-operated locks, card readers and keypad devices are permitted only when **ALL** affected residents/patients have a clinical need for such devices. Any resident/patient, staff member or visitor that does not require security measures for their own safety must have a card or key to operate the lock(s) given to them when they are in the building or the code to operate a lock must be plainly posted at the locked door so that they can open the door without assistance.

Doors that include delayed-egress locks are permitted without restriction when all of the requirements of 7.2.1.6.1 are met. This includes signage at the door, fire sprinkler or fire detection installed throughout the building and a limit of one device in any single path of egress.

Operation of the delayed-egress lock shall override any other lock and permit egress when more than one locking device is present. The delayed-egress feature will allow a combination keypad card reader and/or bracelet locking system.

This interpretation applies to all new and existing health care occupancies with the exception of ambulatory health care occupancies (ASC's). Locks such as keypads or card readers are not permitted on doors in a means of egress in an ASC.

Signature:

Date:

Title: John E. Falgione, State of Nebraska Fire Marshal